

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MITCHELL M. MOREY,

Defendant.

4:15CR **3096**

INFORMATION

18 U.S.C. § 1028(a)(1); (b)(1)(A) and (f)

The United States Attorney charges:

COUNT I

Between on or about May 2012 and March 2014, in the District of Nebraska, and elsewhere, Defendant MITCHELL M. MOREY did knowingly and intentionally combine, conspire, confederate, and agree with others, to engage in conduct in violation of Title 18, United States Code, Section 1028(a)(1), (b)(1) (A), that is producing false identification documents, to wit: fraudulent New York drivers' licenses, such production being in and affecting interstate commerce, in that the false identification documents were transported in interstate commerce through United states mail in the course of the unauthorized production and distribution.

In violation of Title 18, United States Code, Section 1028(a)(1); (b)(1)(A), and (f).

FORFEITURE

The allegations contained in paragraph 1 are hereby realleged and incorporated by reference for purposed of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5).

Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A) and (f) as set forth in count I of this information, Defendant MITCHELL M. MOREY shall forfeit to the United States, pursuant to Title 18 United States Code, Section 982(a)(2)(B), any property, real or personal, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of such violations, and pursuant to Title 18, United States Code, Section 1028(b)(5), and personal property used or intended to be used to commit the offenses, including, but not limited to the following:

- (1) \$1,320 in cash located and seized on 12/18/2013 near 6100 "O" St., Lincoln, NE;
- (2) \$5,260.00 in cash located and seized on 12/18/2013 at 5132 Madison, #8, Lincoln, NE;
- (3) \$4,123.22 of proceeds contained in account number XXXXX1088 in the name of and/or for the benefit of COREY J. LAVIGNE at First National Bank of Omaha, Omaha, NE;
- (4) 1968 Ford Mustang (VIN: 8R01T121974) purchased by COREY J. LAVIGNE on or about March 21, 2013 with proceeds totaling \$10,000;
- (5) 2007 Triumph Daytona motorcycle (VIN: SMTD00NS07J283730), purchased by COREY J. LAVIGNE on or about October 4, 2013 with proceeds totaling \$5,000;
- (6) 2007 Silver Jeep Wrangler (VIN: 1J4GA391X7L211749) purchased by COREY J. LAVIGNE on or about November 23, 2013 with proceeds totaling \$17,750;
- (7) 1980 Yamaha Road / Street motorcycle (VIN: 3J2006457) purchased by COREY J. LAVIGNE on or about March 24, 2014 with proceeds totaling \$2,000;
- (8) \$11,985.92 of proceeds contained in account number XXXXXX1805 in the name of and/or for the benefit of AUSTIN J. ASCHE at Wells Fargo Bank, Omaha, NE;
- (9) \$24,486.22 of proceeds contained in Fidelity Investment account number XXX-XX7135 in the name and/or benefit of AUSTIN J. ASCHE (TIN: XXX-XX-1671);
- (10) Cash deposits of proceeds made into PayPal account number XXXXXXXXXXXX443538339 in the name of AUSTIN J. ASCHE totaling \$23,285.90;
- (11) 1999 Chevrolet Corvette (VIN: 1G1YY12G5X5114397) purchased by AUSTIN A. ASCHE on or about April 16, 2013 with proceeds totaling \$13,500;

- (12) 1998 Jeep Wrangler (VIN: 1J4FY19S9WP781480) purchased on or about January 26, 2013 by AUSTIN A. ASCHE with proceeds totaling \$9,000.00;
- (13) 2014 White Jeep Grand Cherokee Limited (VIN: 1C4RJFBG4EC399714) purchased by AUSTIN A. ASCHE on or about March 4, 2014 with proceeds totaling \$25,000;
- (14) Cash deposits of proceeds made into PayPal account number XXXXXXXXXXXX110066002 in the name of MITCHELL R. MOREY, totaling \$15,635.92;
- (15) Cash deposits of proceeds made into PayPal account number XXXXXXXXXXXX512961937 in the name of Christopher Ratkovec, totaling \$2,730;
- (16) Cash deposits of proceeds made into PayPal account number XXXXXXXXXXXX321166847 in the name of Mike Blevins, totaling \$180;
- (17) Cash deposits of proceeds made into PayPal account number XXXXXXXXXXXX825012391 in the name of Ken Buckingham, totaling \$3,690;
- (18) Cash deposits of proceeds made into PayPal account number XXXXXXXXXXXX589501200 in the name of Jacob Massa, totaling \$1,010

If the property described above, as a result of any act or omission of Defendants:

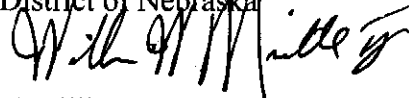
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been comingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Sections 982(b)(1), 1028(g), and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 1028(b)(5), and Title 28, United States Code, Section 2461(c).

UNITED STATES OF AMERICA,  
Plaintiff

DEBORAH R. GILG  
United States Attorney  
District of Nebraska



And: s/ William W. Mickle, II  
WILLIAM W. MICKLE, II, #18130  
Assistant U.S. Attorney  
100 Centennial Mall North, Suite 487  
Lincoln, NE 68508-3865  
Tel: (402) 437-5241